



MONTGOMERY McCRACKEN

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March 12, 2021

BY ECF

The Honorable P. Kevin Castel
United States District Court
for the Southern District of New York
500 Pearl Street
New York, NY 10007

Time to answer is set for April 12. The
March 25 conference is adjourned to
April 26, 2021 at 12:30 p.m. Call-In:
1-888-363-4749; Access Code: 3667981.
SO ORDERED.
Dated: 3/15/2021

Re: Vitale v. BeenVerified, Inc.
Case No. 1:21-cv-00817-PKC


P. Kevin Castel
United States District Judge

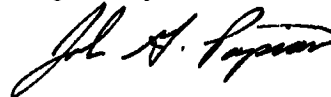
Dear Judge Castel:

I represent Defendant BeenVerified, Inc. ("BeenVerified") in the above-referenced matter and write with the consent of all parties to request an adjournment of the Initial Pretrial Conference scheduled for March 25, 2021.

Plaintiff commenced this action on January 29, 2021. On February 11, BeenVerified executed a waiver of service, making its response due April 12. Given that BeenVerified is investigating Plaintiff's claims, and that its response is now due after the March 25 Initial Pretrial Conference, the parties believe it would be most efficient for the Court to adjourn the conference until after BeenVerified files its response. This practice is consistent with the Court's individual rules, which provide that "A request for an adjournment of time to answer a complaint should include a request to adjourn the initial conference to a date at least 14 days after the answer would be due."

Accordingly, the Parties request that the Court adjourn the March 25 Initial Pretrial Conference and that the Court re-schedule it for a date in May 2021 (i.e., a date at least two weeks after April 12, 2021). No adjournment or extension has been previously sought.

Respectfully submitted,



John G. Papianou

cc: Alexis I. Lehman, Esquire (by ECF)

MONTGOMERY McCRACKEN WALKER & RHOADS LLP

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